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11 **Admitted Pro Hac Vice*
Attorneys for Plaintiffs

12
13 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

14 ANGELA WILLIAMS; JANE DOE #1; JANE
15 DOE #2,

16 Plaintiffs,

17 v.

18 STEVE SISOLAK, Governor of Nevada, in his
official capacity; AARON FORD, Attorney
19 General of Nevada, in his official capacity;
THE CITY OF LAS VEGAS; CLARK
20 COUNTY; NYE COUNTY; WESTERN
BEST, INC. D/B/A CHICKEN RANCH;
21 WESTERN BEST LLC; JAMA RASHID;
MALLY MALL MUSIC, LLC; FUTURE
22 MUSIC, LLC; PF SOCIAL MEDIA
MANAGEMENT, LLC; E.P. SANCTUARY;
23 BLU MAGIC MUSIC, LLC; EXCLUSIVE
BEAUTY LOUNGE, LLC; FIRST
24 INVESTMENT PROPERTY, LLC; V.I.P.
ENTERTAINMENT, LLC; MP3
25 PRODUCTIONS, INC.; MMM
PRODUCTIONS, INC.;

CASE NO.: 2:21-cv-01676-APG-VCF

STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING STATUS
CONFERENCE SCHEDULED FOR
JANUARY 7, 2022
[FIRST REQUEST]

SHAC, LLC D/B/A SAPPHIRE
GENTLEMAN'S CLUB AND/OR
SAPPHIRE; SHAC MT, LLC; and LAS
VEGAS BISTRO, LLC D/B/A LARRY
FLYNT'S HUSTLER CLUB,

Defendants.

COMES NOW Plaintiffs Angela Williams; Jane Doe #1; and Jane Doe #2, by and through their counsel of record, HUTCHISON & STEFFEN, PLLC, Defendants STEVE SISOLAK, Governor of Nevada and AARON FORD, Attorney General of Nevada, by and through their counsel of record THE NEVADA STATE ATTORNEY GENERAL'S OFFICE, THE CITY OF LAS VEGAS by and through their counsel of record THE LAS VEGAS CITY ATTORNEY'S OFFICE, CLARK COUNTY by and through its counsel of record CLARK COUNTY DISTRICT ATTORNEY CIVIL DIVISION, NYE COUNTY by and through its counsel of record THORPE & SWAINSTON, LTD., LAS VEGAS BISTRO, LLC D/B/A LARRY FLYNTS HUSTLER CLUB by and through its counsel of record SHAFER & ASSOCIATES, P.C, WESTERN BEST, INC. D/B/A CHICKEN RANCH and WESTERN BEST, LLC by and through its counsel of record FOX ROTHSCHILD LLP, SHAC, LLC DBA SAPPHIRE GENTLEMAN'S CLUB and/or SAPPHIRE AND SHAC, MT, LLC by and through their counsel of record LEWIS ROCA ROTHGERBER CHRISTIE, LLP, hereby stipulate and agree to the following:

1. This is the First Request for Continuance.
2. Good cause exists to continue the Status Conference scheduled for January 7, 2022 at 10:00a.m. due to Plaintiff's Lead counsel's illness from COVID.
3. The Status Conference Scheduled in this matter for January 7, 2022 shall be vacated.
4. The parties further agree that the Status Conference originally scheduled for January 7, 2022 be continued at least two weeks from the date of January 7, 2022 at a time the court designates.

1 **IT IS SO STIPULATED.**

2 DATED this 6th day of January, 2022.

3 **HUTCHINSON & STEFFEN, PLLC**

4

5 /s/ Jason D. Guinasso

6 Jason D. Guinasso, Esq.

7 Nevada Bar No. 8478

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12 jguinasso@hutchlegal.com

13 Attorney for Plaintiffs

14 DATED this 6th day of January, 2022.

15 /s/ Joel K. Browning

16 Joel K Browing

17 Clark County District Attorney Civil

18 Division 500 S. Grand Central

19 Pkwy., #5075 Las Vegas, NV

20 89155-2215 702-455-4761 702-382-

21 5178 (fax)

22 joel.browning@clarkcountyda.com

23 Attorney for Defendant Clark County

24 DATED this 6th day of January, 2022.

25 **FOX ROTHSCHILD LLP**

26 /s/ Deanna Forbush

27 Deanna Forbush

28 Nevada Bar No. 6646

1980 Festival Plaza Drive, Suite 700

Las Vegas, NV 89135

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Facsimile: (702) 597-5503

Dforbush@foxrothschild.com

Attorneys for Defendants Western Best, LLC
and Western Best Inc. d/b/a Chicken Ranch

DATED this 6th day of January, 2022.

/s/ Gregory Louis Zunino

Gregory Louis Zunino

Nevada State Attorney General's

Office 100 N Carson Street Carson

City, NV 89701 775-684-1137 775-

684-1108 (fax) GZunino@ag.nv.gov

Attorney for Defendants Aaron Ford
and Steve Sisolak

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DATED this 6th day of
January, 2022.

DATED this 6th day of
January, 2022.

DATED this 6th day of
January, 2022.

/s/ Brent Ryman.

/s/ Zachary M. Youngsma

/s/ Jeffrey Galliher.

Paul M Bertone
Brent L Ryman
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Attorney for Defendant
Las Vegas Bistro, LLC

Jeffrey L Galliher
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Attorney for Nye County


Attorney for Defendant
Las Vegas Bistro, LLC

Attorney for The City of
Las Vegas

ORDER

IT IS HEREBY ORDERED that good cause to continue the Status Conference Scheduled for January 7, 2022 at 10:00a.m., due to lead counsel for Plaintiffs becoming ill with COVID, the Status Conference Plaintiff. IT IS FURTHER ORDERED THAT the Status Conference Scheduled in this matter for January 7, 2022 shall be vacated. IT IS FURTHER ORDERED THAT the Status Conference originally scheduled for January 7, 2022 shall be continued to January 27, 2022 at 10:00 am.

IT IS SO ORDERED this 6th day of January, 2022.



Cam Ferenbach
United States Magistrate Judge

Respectfully Submitted by:
HUTCHISON & STEFFEN, PLLC

By: /s/ Jason D. Guinasso
Jason D. Guinasso
Nevada Bar No. 8478
HUTCHISON & STEFFEN, PLLC
5371 Kietzke Lane
Reno, NV 89511
Attorney Plaintiffs

ELECTRONIC CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that on this 6th day of January, 2022, a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER CONTINUING STATUS CONFERENCE SCHEDULED FOR JANUARY 7, 2022** was electronically filed with the United States District Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

Defendant

Steve Sisolak

Governor of Nevada

represented by **Gregory Louis Zunino**

Nevada State Attorney General's Office 100

N Carson Street Carson City, NV 89701

775-684-1137

Fax: 775-684-1108

Email: GZunino@ag.nv.gov,

sgeyer@ag.nv.gov

Defendant

Aaron Ford

Attorney General of Nevada

represented by **Gregory Louis Zunino**

(See above for address)

Defendant

The City of Las Vegas

represented by **Jeffrey L Galliher**

Las Vegas City Attorney's Office

495 S Main Street, 6th Flr

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702-229-6629

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Defendant
Clark County

represented by **Joel K Browning**
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Defendant
Nye County

represented by **Brent L Ryman Erickson**
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Defendant
Las Vegas Bistro, LLC D/B/A
Larry Flynt's Hustler Club

represented by **Zachary Youngsma**
c/o Deanna L. Forbush
Fox Rothschild LLP
198 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
702-262-6899
Fax: 702-597-5503
Email: dforbush@foxrothschild.com;
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Defendant
Western Best Inc. D/B/A
Chicken Ranch

represented by **Deanna L. Forbush**
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Las Vegas, Nevada 89135
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1 **Defendant**

2 Western Best LLC

represented by **Deanna L. Forbush**

3 Fox Rothschild LLP

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5 Fax: 702-597-5503

6 Email: dforbush@foxrothschild.com

7 **Defendant**

8 SHAC, LLC d/b/a Sapphire

Gentlemen's Club and/or Sapphire

9 Represented by:

10 Lewis Roca Rothgerber Christie LLP

Hughes Center

11 3993 Howard Hughes Parkway

Suite 600

12 Las Vegas, NV 89169-5996

702.474.2622

13 702.949.8298 (fax)

14 E-mail: OBrown@lrrc.com

15
16 **Defendant**

SHAC, MT, LLC

17 Represented by:

18 Lewis Roca Rothgerber Christie LLP

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19 3993 Howard Hughes Parkway

Suite 600

20 Las Vegas, NV 89169-5996

702.474.2622

21 702.949.8298 (fax)

22 E-mail: OBrown@lrrc.com

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that on this 6th day of January, 2022,
**STIPULATION AND [PROPOSED] ORDER CONTINUING STATUS CONFERENCE
SCHEDULED FOR JANUARY 7, 2022** was electronically filed with the United States District
Court. I caused service via US Mail upon the following:

Defendant

Jamal Rashid
Federal Correction Institution
Sheridan at 27072 SW Ballston Rd.
Sheridan, OR 97378
(Inmate #45040-509)

Defendant

Mally Mall Music, LLC
Attn: Jamal Rashid
Federal Correction Institution Sheridan
27072 SW Ballston Rd.
Sheridan, OR 97378
(Inmate #45040-509)

Defendant

E.P. Sanctuary
Attn: Jamal Rashid
Federal Correction Institution Sheridan
27072 SW Ballston Rd.
Sheridan, OR 97378
(Inmate #45040-509)

Defendant

Blu Magic Music, LLC
Attn: Jamal Rashid
Federal Correction Institution Sheridan
27072 SW Ballston Rd.
Sheridan, OR 97378
(Inmate #45040-509)

1 **Defendant**

2 Exclusive Beauty Lounge, LLC
3 Attn: Jamal Rashid
4 Federal Correction Institution Sheridan
5 27072 SW Ballston Rd.
6 Sheridan, OR 97378
7 (Inmate #45040-509)

8 **Defendant**

9 First Investment Property LLC
10 Attn: Jamal Rashid
11 Federal Correction Institution Sheridan
12 27072 SW Ballston Rd.
13 Sheridan, OR 97378
14 (Inmate #45040-509)

15 **Defendant**

16 V.I.P Entertainment, LLC
17 Attn: Jazz A.
18 2764 N Green Valley Pkwy #400
19 Henderson, NV, 89014

20 **Defendant**

21 MP3 Productions, INC.,
22 c/o Registered Agent: Nevada Corporate Headquarters, Inc.
23 4730 S Fort Apache Rd, Suite 300,
24 Las Vegas, NV, 89147

25 **Defendant**

26 MMM Productions, INC,
27 Attn: Jamal Rashid
28 Federal Correction Instutuion
Sheridan at 27072 SW Ballston Rd.
Sheridan, OR 97378
(Inmate #45040-509)

DATED this 5th day of January, 2022

BY: /s/Bernadette Francis

An Employee of Hutchison & Steffen, PLLC